

EXHIBIT B



U.S. Department of Justice

*United States Attorney
Northern District of Ohio*

United States Court House
801 West Superior Avenue, Suite 400
Cleveland, Ohio 44113-1852

June 21, 2018

ROSS T. SMITH, Esq.
Huntington Bank Building
26 Market Street, Suite 610
Youngstown, OH 44503

RE: UNITED STATES v. NICOLESCU et al.

Dear Mr. Smith:

Enclosed are two Blu-Ray DVRs containing additional documents and materials in the possession of the United States in relation to the above-captioned case. Specifically, contained on the DVRs are the following items:

- Documents from Liam O'Murchu (Symantec)
- Documents from Eion Miller (AOL)
- Documents & Files from Romania authorities
- Documents & files excerpted from C&C servers
- ReadNotify documents
- IC3 Complaints
- Victim spreadsheet
- Certified Trademark Registrations
- Certified Visa Records
- Reverse proffer documents in color
- Photographs of messages on defendants' phones
- Photographs from Defendants' seized devices
- Photographs of Danet in the United States
- Photographs of certain search/arrest locations in Romania.

Many of these documents have already been produced to defendants, but are being reproduced here, in some cases with improved formatting. The enclosed DVRs contain two general categories of documents and materials. First, included are statements, reports, and other production recently obtained from witnesses the government presently intends to call at trial. The government is providing these items well in advance of trial for your convenience. If the government obtains additional materials from likely witnesses, it will provide them to you on a timely basis.

Second, some of you requested the "greatest hits," so as the government continues to identify and prepare "excerpts" or "extracts" from the voluminous records it has already produced and/or made available to you, it is providing you with those excerpts or extracts in the interest of focusing your attention on the evidence that is the most likely to use during its case-in-chief.

All evidence referred to in the enclosed reports as well as any other items seized from the defendant or to be offered by the government in its case-in-chief is available for your inspection at a mutually convenient time.

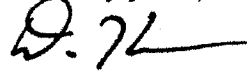
Please note that by disclosing evidence beyond our legal requirements, the government is not waiving its right to object to any request for additional disclosures.

Under Rule 16(b)(1)(A) and (B) of the Federal Rules of Criminal Procedure, this letter reiterates the government's request for reciprocal discovery to inspect and copy any books, papers, documents, photographs, tangible objects, and results of physical or mental examinations or scientific tests or experiments, which are in the custody or control of the defendant, or with the exercise of due diligence can be obtained by the defendant, and which the defendant intends to introduce as evidence at his forthcoming trial.

The government also respectfully requests notice of any defense based on mental condition, insanity, duress or entrapment.

If you have any questions, please contact me at (216) 622-3933 or Duncan.brown@usdoj.gov.

Very truly yours,

A handwritten signature in black ink, appearing to read "D. T. Brown", with a stylized flourish at the end.

Duncan T. Brown



U.S. Department of Justice

*United States Attorney
Northern District of Ohio*

United States Court House
801 West Superior Avenue, Suite 400
Cleveland, Ohio 44113-1852

June 21, 2018

RONALD L. FREY, Esq.
THE FREY LAW FIRM, LLC
600 Superior Ave. E #1300
Cleveland, OH 44114

RE: UNITED STATES v. NICOLESCU et al.

Dear Mr. Frey:

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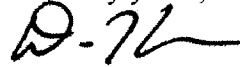
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Very truly yours,

A handwritten signature in black ink, appearing to read "D. Brown", written over the typed name.

Duncan T. Brown



U.S. Department of Justice

*United States Attorney
Northern District of Ohio*

United States Court House
801 West Superior Avenue, Suite 400
Cleveland, Ohio 44113-1852

June 21, 2018

Michael J. O'Shea, Esq.
Hoyt Block Building - Suite 110
700 West St. Clair Avenue
Cleveland, Ohio 44113

RE: UNITED STATES v. NICOLESCU et al.

Dear Mr. O'Shea:

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Duncan T. Brown